

3/29/07-00619

Staszak, Janna/VBO

From: Doran, Karen [kmdoran@deq.virginia.gov]
Sent: Thursday, March 29, 2007 3:10 PM
To: Henderson, Kimberly/VBO; agnes.sullivan@navy.mil; Staszak, Janna/VBO; barber.joshua@epamail.epa.gov
Subject: Site 2 Triad WP - VDEQ comments

Team -

I have reviewed the referenced report and submit the following VDEQ comments:

Typographical comments:

1. Figure 1-4, second pink diamond - "is sediment to dense..." - replace "to" with "too"
2. Figure 1-5, just above the last pink diamond - to maintain consistency with other flowcharts insert another pink diamond that says, "Have all MIP locations been completed?" - if no, then continue with the next proposed MIP boring
3. Figure 1-6, blue rounded rectangle below the first pink diamond - appears to be a typo
4. Pages 2-4 through 2-6 and including rest of section headings - Section numbering appears to be off - "Section 2.5 Soil" should be 2.4.2 - "Section 2.5.1 Groundwater" should be 2.4.3 - "Section 2.5.2 Stormwater, SW, and Sed." should be 2.4.4 - "Section 2.6 Contaminant F & T" should be Section 2.5, and so on
5. Page 2-6, first full sentence - "Contaminant trend data...shows TCE concentrations and its breakdown products are decreasing..." - change to "...shows concentrations of TCE and its breakdown products are decreasing..."
6. Page 2-7, under "Saturated Zone Migration", third paragraph - paragraph appears to be incomplete - "DNAPLs do not behave the same as aqueous phase (dissolved) VOCs." - How do DNAPLs behave? More info appears pertinent here
7. Page 2-8, last paragraph, first sentence - "The State of Virginia..." - change "State" to "Commonwealth"
8. Page 2-9, first paragraph, last sentence - replace "Requirement" with "Requirements"
9. Page 2-11, last paragraph, first sentence - sentence is awkward, please reword
10. Table 2-3 - what does the = sign mean? - please add to table footnotes

Technical comments:

11. In section 2.1.2 Site History it states, "Mixed municipal wastes, ABM waste ordnance, organics, metals, and solvents were reportedly disposed of." Then, in section 2.9.2 Work Element B: Waste, Soil, and Sediment under the "Partial Removal" heading it states, "Because the site history indicates that the waste disposed at Site 2 was inert, consisting mostly of construction debris, leaving the waste on site may not contribute to the site risks." These two statements seem contradictory, please clarify. Also, please provide justification for the statement that the waste was inert and that the waste

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- may not contribute to the site risks.
12. The Site 2 inlet currently contains wetlands, open water and surface water drainage features. Since these features are considered ecologically sensitive, visible waste may need to be removed from these areas and the wetlands restored. Additional data regarding visible waste in the wetland will need to be collected during the Dynamic Work Plan phase, i.e. spatially locate what type of debris is visible in the wetland and drainage areas - concrete, railroad ties, metal drums, treated wood, etc. This will assist team members in making decisions regarding the extent of excavation activities. Please add, "Removal of visible debris in wetland and drainage areas" to Section 2.9.2 Work Element B.
 13. Since leaving the waste on site may or may not contribute to the site risks (see comment #11) this additional RAO should be considered, "Prevent further contamination of site media from waste."

Please also include the comments made at the March 2007 partnering meeting.
Thank you for the opportunity to comment.

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